



Ms. Marlene H. Dortch, FCC Secretary Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW, Suite TW-A325 Washington, DC 20554

RE: EB Docket No. 06-36

2010 CPNI Certification Filing for National Brands, Inc.

d/b/a Sharenet Communications Company

Form 499 Filer ID 803190

Dear Ms. Dortch:

In accordance with Federal Communications Commission's Enforcement Advisory No. 2011-02, DA 11-159, EB Docket No. 06-36, released January 28, 2011 and pursuant to 47 C.F.R. § 64.2009(e), National Brands, Inc. d/b/a Sharenet Communications Company files its Certification of Customer Proprietary Network information (CPNI) for the year 2010. Please include this Certification in EB Docket No. 06-36.

Any questions you may have concerning this filing may be directed to me at 470-740-3002 or via email to <a href="mailto:cwightman@tminc.com">cwightman@tminc.com</a>.

Sincerely,

/s/Connie Wightman Consultant to National Brands, Inc. d/b/a Sharenet Communications Company

CW/lw

#### Attachments

cc: Best Copy and Printing - (FCC@BCPIWEB.COM)

cc: Gary Joseph, Sharenet

file: NTBR - FCC tms: FCCx1101

### ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

#### EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2011:

Covering calendar year 2010

Name of company(s) covered by this certification:

National Brands, Inc. d/b/a Sharenet

Communications Company

Form 499 Filer ID:

803190

Name of signatory:

Gary Joseph

Title of signatory:

Vice President

- 1. I, Gary Joseph, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. §64.2001 *et seq*.
- 2. Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in §64.2001 et seq. of the Commission's rules.
- 3. The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
- 4. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.
- 5. The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Gary Joseph, Vice President

Date

Attachments:

Accompanying Statement explaining CPNI procedures

Explanation of actions taken against data brokers (not applicable, see

Statement)

Summary of customer complaints (not applicable, See Statement)

## Attachment A Statement of CPNI Procedures and Compliance

# Attachment A Statement of CPNI Procedures and Compliance National Brands, Inc. d/b/a Sharenet Communications Company

#### USE OF CPNI

Sharenet Communications Company uses CPNI to market to certain of its customers and notifies its customers of their right to restrict use of, disclosure, and access to their CPNI, prior to asking for approval to use CPNI. Customer approval is obtained using opt-in approval, and the company maintains records establishing proof that approval was obtained. The company follows the applicable rules set forth in 47 CFR Subpart U, and has in place operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

#### PROTECTION OF CPNI

As set forth below, Sharenet has put into place processes to safeguard its customers' CPNI (including call detail information) from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI. The company trains its employees regarding its procedures for protecting CPNI on an ongoing basis and monitors the interactions of its employees with customers to insure that procedures are being followed.

Sharenet ensures that all access to CPNI is approved by a supervisor with knowledge of the FCC's CPNI requirements. Sharenet has instituted training procedures and a corresponding disciplinary process to ensure that its personnel understand and comply with restrictions regarding the use and disclosure of, and access to, CPNI.

Sharenet maintains a record of all sales and marketing campaigns that use CPNI. Sharenet maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties where allowed access to CPNI.

#### DISCLOSURE OF CALL DETAIL OVER PHONE

All customers will be properly authenticated before Sharenet will disclose CPNI in response to a telephone call. Sharenet follows the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information and customer notification of account changes.

To the extent that local exchange carriers ("LEC") and billing agents act as agents of Sharenet when dealing with transient operator services customers, Sharenet has been assured by those agents that they only provide information to customers who are able to provide all of the call detail information necessary to address the customer's billing or service issue. If a customer cannot provide the call detail information to qualify for the billing and customer service exception, the LEC would treat the call in accordance with its established procedures for releasing call detail to its subscribed customers. Where inquiry is handled by the billing agent, if the customer cannot provide the call detail

information to qualify for the exception, Sharenet has instructed the billing agent and has received assurances that it will tell the customer to call back with the call detail before providing other assistance.

For customers of its local and non-transient toll services, Sharenet does have CPNI, including call detail information concerning the calls made using the Company's services. Sharenet will only disclose call detail information over the telephone in response to a customer-initiated contact if Sharenet can authenticate the identity of the caller. As a small company, the customer contacts are known to the company's personnel. If the customer can provide call detail information to Sharenet during a customer-initiated call without Sharenet's assistance, then Sharenet will discuss the call detail information provided by the customer.

#### DISCLOSURE OF CPNI ONLINE

Sharenet does not disclose CPNI through any online services.

#### DISCLOSURE OF CPNI AT RETAIL LOCATIONS

Sharenet does not have any retail locations and therefore does not disclose CPNI in-store.

#### NOTIFICATION TO LAW ENFORCEMENT

Sharenet has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement. Sharenet maintains records of all breaches discovered and notifications made to the USSS and the FBI, and to customers.

#### **ACTIONS AGAINST DATA BROKERS**

Sharenet has not taken any actions against data brokers in the last year.

#### CUSTOMER COMPLAINTS ABOUT CPNI BREACHES

Sharenet did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2010.

#### INFORMATION ABOUT PRETEXTERS

Sharenet has not developed any information with respect to the processes pretexters are using to attempt to access CPNI but does take steps to protect CPNI by adhering to the guidelines described herein for access to CPNI. Sharenet is committed to notify the FCC of any new or novel methods of pretexting that it encounters and of any actions Sharenet takes against pretexters and data brokers.